

IN THE UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF NORTH CAROLINA
NORTHERN DIVISION
CIVIL ACTION NO. 2:12-cv-00053-D

KATHRYN STONE,

Plaintiff,

vs.

TWIDDY & COMPANY OF DUCK, INC.,
et al.,

Defendants.

CONSENT MOTION TO REMAND / MOTION TO TRANSFER

NOW COME the parties and move the Court for an Order remanding or transferring this case to the Superior Court of Dare County, North Carolina for the convenience of the parties and in the interests of justice. Defendant Twiddy is a resident of Dare County, North Carolina. Additionally, Dare County is the location in which the subject accident occurred. As such, the Dare County Superior Court is a division where the original action might have been brought. Furthermore, all parties have consented to the transfer of this action.

WHEREFORE, the parties pray that this action be remanded or transferred to the State Superior Court of Dare County, North Carolina.

WE CONSENT:

/s/ Jeffrey D. Keister
Jeffrey D. Keister
Attorney for Twiddy & Company of Duck, Inc.

/s/ Adrienne S. Blocker
Adrienne S. Blocker
Attorney for Plaintiff

/s/ Luke P. Sbarra and J. Allen Thomas
Luke P. Sbarra and J. Allen Thomas
*Attorneys for Marc Robinson, Executor for
the Estate on Behalf of William J. Fields*

This the 9th day of November, 2012.

s/JEFFREY D. KEISTER
Bar No: 28612
Attorney for Twiddy & Company of Duck, Inc.
MCANGUS, GOUDELOCK & COURIE, P.L.L.C.
Post Office Box 30516
Raleigh, North Carolina 27622
Phone: (919) 719-8200
Fax: (919) 510-9825

CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2012 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Adrienne S. Blocker
Law Offices of James Scott Farrin
280 S. Mangum Street, Suite 400
Durham, North Carolina 27701
Tel: (919) 688-4991
Fax: (919) 246-0495
Attorney for Plaintiff

Luke P. Sbarra
Hedrick, Gardner, Kincheloe & Garofalo, LLP
Post Office Box 30397
Charlotte, North Carolina 28230
Tel: (704) 366-1101
Fax: (704) 366-6181
*Attorney for Defendant Marc Robinson,
Executor for the Estate on behalf of William J.
Fields*

J. Allen Thomas
Hedrick, Gardner, Kincheloe & Garofalo, LLP
4011 Westchase Boulevard, Suite 300
Raleigh, North Carolina 27607
Tel: (919) 719-3706
Fax: (919) 832-9425
*Attorney for Defendant Marc Robinson,
Executor for the Estate on behalf of William J.
Fields*

s/ J.D. KEISTER
Bar No: 28612
Attorney for Twiddy & Company of Duck, Inc.
McAngus Goudelock & Courie
Post Office Box 30516
Raleigh, North Carolina 27622
Phone: (919) 719-8200
Fax: (919) 510-9825
jkeister@mgclaw.com